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FILED

FEB 01 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT HAGGERTY

)  
) Criminal No. 22-15  
)  
) (18 U.S.C. §§ 2252(a)(2),  
) 2252(a)(4)(B), 2252(b)(2))  
)  
) [UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

On or about September 11, 2021, in the Western District of Pennsylvania and elsewhere, the defendant, ROBERT HAGGERTY, did knowingly receive Visual Depiction 1, a visual depiction of a minor using any means and facility of interstate and foreign commerce, namely, by computer and the Internet, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, and that depicted a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT TWO**

The grand jury further charges:

On or about September 11, 2021, in the Western District of Pennsylvania and elsewhere, the defendant, ROBERT HAGGERTY, did knowingly receive Visual Depiction 2, a visual depiction of a minor using any means and facility of interstate and foreign commerce, namely, by computer and the Internet, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, and that depicted a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT THREE**

The grand jury further charges:

On or about September 11, 2021, in the Western District of Pennsylvania and elsewhere, the defendant, ROBERT HAGGERTY, did knowingly receive Visual Depiction 3, a visual depiction of a minor using any means and facility of interstate and foreign commerce, namely, by computer and the Internet, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, and that depicted a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

In violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT FOUR**

The grand jury further charges:

On or about October 7, 2021, in the Western District of Pennsylvania and elsewhere, the defendant, ROBERT HAGGERTY, did knowingly possess visual depictions, namely, videos and images in computer graphic and digital files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct, all of which had been shipped and transported in interstate and foreign commerce, by means of a computer.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FORFEITURE ALLEGATIONS**

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to defendant ROBERT HAGGERTY that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 2253, in the event of the defendant's conviction under any of Counts One through Four of this Indictment.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in any of Counts One through Four of this Indictment, in violation of Title 18, United States Code, Section 2252, the defendant, ROBERT HAGGERTY, shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

3. As a result of the commission of the violations of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1), and Sections 2252(a)(4)(B) and 2252(b)(2), as charged in Counts One through Four of this Indictment, the following property, which was used to commit or to facilitate the commission of said violations (herein after collectively referred to as the "Subject Property") is to be forfeited:

a. One (1) Samsung Tablet, bearing serial number SM-T377A, with IMEI-359768084131084

b. One (1) Samsung Tablet, bearing serial number SM-T727A, with IMEI 358783100394658

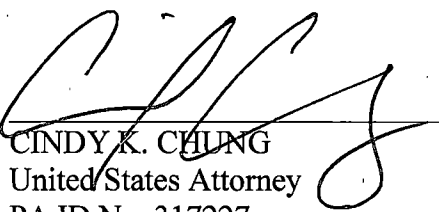
4. If any of the property described above, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A True Bill,

  
FOREPERSON

  
CINDY K. CHUNG  
United States Attorney  
PA ID No. 317227